

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

O'Neill, et al. v. The Republic of Iraq, No. 1:04-cv-01076 (GBD) (SN)

BNY Mellon, et al. v. Islamic Republic of Iran, No. 1:19-cv-11767 (GBD) (SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified on Exhibit A in the above referenced action. The individuals being substituted into the case are the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001 (a “9/11 decedent”) or the Personal Representative of a family member of a 9/11 decedent.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs’ Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court’s ECF system to ease the burden on the Clerk of the Court’s Office and the size of this MDL.

Dated: August 11, 2022

/s/ Jerry S. Goldman

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EXHIBIT A to Mellon Motion to Substitute Parties

	Previous Personal Representative:	Case Number:	Substitute Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	9/11 Decedent's Name:
1.	John Doe 83, being intended to designate the Personal Representative of the Estate of Timothy Haviland, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Haviland	No. 1:19-cv-11767 (GBD) (SN)	Barbara Keane, as Personal Representative of the Estate of Timothy Haviland, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Haviland	PA	Timothy Haviland